

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BRIAN MILLER, *et al.*,
Plaintiffs,

v.

COMPUTER SCIENCES CORPORATION,
Defendant.

Civil Action No. 05-010-JJF

DEFENDANT'S PROPOSED VOIR DIRE

Defendant, Computer Sciences Corporation ("CSC"), by and through its undersigned counsel, respectfully submits the following proposed voir dire pursuant to Local Rule 47.1.

Background

1. Other than what I have just told you, have you heard, seen or read anything about this case?
2. Have you, someone in your family, or a close friend ever been involved in any situation like what you have heard so far about this case?
3. The Defendant in this case is Computer Sciences Corporation, also known as CSC. Are you familiar with CSC?
4. The following persons may be called as witnesses or referred to during the trial. If you know of, have heard of, or have any association with any of these people, please stand:

Brian Miller

Hector Calderon

Charles Folwell

Dawn Hauck

Kevin Keir

Ashby Lincoln

Karen Masino

Robert Peterson

Sue Pokoiski

Dan Rollins

William Sperati

Monique Burton

Tony Doye

Dorothy Eltzroth

Sonia Koplowicz

Henry M. ("Marty") Leidemer

Mary Jo Morris

Russ Owens

Eugene "Gene" M. Procopio

Gus Siekierka

James Styles

Nick Wilkinson

5. Have you ever been a Plaintiff, Defendant or witness in a civil lawsuit or criminal action?

Employment

6. Have you ever worked in the field of human resources or personnel?

7. Have you, someone in your family, or a close friend ever had a complaint related to your wages with an employer or an agency such as the Department of Labor?

8. Have you or any of your family members or close friends ever been denied payment from an employer which you (or they) believe they had earned?

9. Have you or any of your family members or close friends ever worked for any federal, state, or local agency involved in the enforcement of employment-related laws?

10. Have you, someone in your family, or a close friend ever had a significant dispute with a supervisor or employer, even if it did not result in a lawsuit being filed?

Biases

11. CSC is a corporation. Do you have strong negative feelings about corporations?

12. Do you believe that most corporations accused of withholding money from employees probably did it?

13. Corporations are entitled to the same fair trial as a private individual. Would you have trouble deciding this result in favor of CSC if the evidence warranted such a result?

14. Do you think that the mere fact that a lawsuit is brought is evidence that plaintiffs have been wronged and should recover?

15. The fact that the Plaintiffs did not receive a year-end bonus from CSC may cause you to feel sympathy for them. I will instruct you that you must not consider that sympathy as you listen to the evidence and make your decisions. You must consider and decide this case solely on the evidence and law, and not based on sympathy for any party. Do you think that you can follow this instruction?

General

16. This trial may last up to 2 days. Is there any reason why a trial of this length would present a severe hardship for you?

17. Is there any reason, based on any of the questions I have asked you, or for any other reason that I may not have covered in these questions, that any of you feel that you could not sit as a juror in this case and fairly and impartially decide this case based solely on the evidence presented and the law as I instruct you on it?

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2006, the attached document was hand delivered to the following attorney of record and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

BY HAND DELIVERY

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